

MATTHEW J. KLUGER  
ATTORNEY AT LAW

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## MEMO ENDORSED

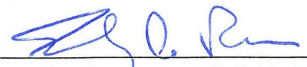
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May 12, 2020

By ECF

Honorable Edgardo Ramos  
U.S. District Judge  
Southern District of New York  
40 Foley Square  
New York, N.Y. 10007

The May 14 pretrial conference is adjourned to June 23, 2020 at 10:00 AM. Speedy trial time is excluded from May 14, 2020, until June 23, 2020, in the interest of justice.  
**SO ORDERED.**



Edgardo Ramos, U.S.D.J.

Dated: 5/14/2020

New York, New York

**Re: United States v. Angela Rodriguez and Shawndale Lewis**  
**20 Cr. 39 (ER)**

Dear Judge Ramos:

I represent defendant Angela Rodriguez in the above-referenced matter. With the consent of A.U.S.A. Samuel Rothschild and Richard Ma, attorney for defendant Shawndale Lewis, I write now to respectfully request a 30-day adjournment of the next status conference, which is currently scheduled for May 14, 2020 at 3:30 p.m.

Defense counsel continue to review the voluminous discovery in this matter. Moreover, given the current health crisis and Chief Judge McMahon's Standing Order, in-court appearance is not possible at this time. Accordingly, to allow additional time for the continued review of discovery, client communications, and plea negotiations, the parties respectfully request a 30-day adjournment of the upcoming status conference.<sup>1</sup>

In the event that the Court grants this request, the defense has no objection to the exclusion of time for the reasons stated herein.

Thank you.

Respectfully,

/s/ Matthew J. Kluger

Matthew J. Kluger, Esq.

Attorney for Angela Rodriguez

cc: Richard Ma, Esq.  
AUSA Samuel P. Rothschild

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<sup>1</sup> If personal appearance is not possible on the adjourned date, the parties have no objection to appearing either by video or telephone.